BAY STATE GAS COMPANY
D.T.E. 02-52

FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BAY STATE GAS COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c) the Department of Telecommunications and Energy ("Department") submits to Bay State ("Bay State" or the "Company") the following Information Requests.

D.T.E. 1-1 Please clarify the periods in which the new supply gas contract will cover: (1) January 16, 2003 through March 31, 2003, and (2) January 16, 2003 through March 31, 2005 (p. 2 of the Company's filing) or (1) January 15, 2003 through February 1, 2003, and (2) February 1, 2003 through April1, 2005 (p. 3 of the Company's filing).

D.T.E. 1-2 Please state the period covered by the Company's most recent approved Forecast and Supply Plan.

D.T.E. 1-3 In regard to the current Canadian supply contract that expires on January 15, 2003, please, provide:

(a) length of the contract,
(b) the loss of MMBtu per day when the current contract expires,
(c) the proportion that this contract represents (MMBtu per day) in the Company's total commodity resource portfolio,
(d) the proportion that this contract represents in the Company's design-day requirement.

D.T.E. 1-4 Please refer to p. 3 of the Company's filing ("Prefiled testimony of Francisco C. DaFonte). It is stated that the DCQ or daily contract quantity will be 10,471 Dth/day. Please provide:

(a) the proportion of the DCQ represents in the Company's total commodity resource portfolio,
(b) the proportion that the DCQ represents in the Company's design-day requirement,
(c) the proportion that the DCQ represents in the Company's seasonal requirements.

D.T.E. 1-5 Please discuss how the Company evaluated the need to renew the Canadian contract as a part of the Company's resource portfolio. Specifically, provide a Table with the

following information and for time period Feb. 2003 through April, 2005:

(a) forecast of firm sales customers,
(b) forecast of firm sales,
(c) forecast of firm transportation customers,
(d) forecast of firm transportation sales,
(e) forecast of reverse migration (number of firm transportation customers coming back to firm sales service),
(f) forecast of reverse migration (sales).

D.T.E. 1-6 Please discuss the pricing structure of the proposed supply contract in terms of demand charge and commodity charge.

D.T.E. 1-7 Please refer to p. 11 ("Prefiled testimony of Francisco C. DaFonte") and to the exhibit FCD-11 of the Company's filing. Could the Company explain how it allocated the maximum percentage values for every non-price attribute of each bid? For instance, with respect to the "security in supply" attribute, what is the methodology the Company used to assign 33 points to bid D and 32 points to bid C? Please discuss.

D.T.E. 1-8 Please discuss how the new gas commodity contract will contribute to the strength of the Company's overall supply portfolio.

D.T.E. 1-9 Please refer to p. 11 of the Company's filing ("Prefiled testimony of Francisco C. DaFonte"). The Company stated that the bids were assessed in terms of four criteria: price, security, flexibility, and supplier viability. Discuss how the new gas commodity contract will contribute to diversify the Company's commodity resource portfolio. Please provide a Table containing the total number of gas commodity contracts, area of origin of gas, length of contracts, and suppliers.

D.T.E. 1-10 Please refer to p. 14 of the Company's filing ("Prefiled testimony of Francisco C. DaFonte"). The Company stated that it used its SENDOUT model to choose the appropriate "maximum daily quantity" or MDQ of a range of resource alternatives over a given time period (from November 2002 through October 2005) and that the SENDOUT model opted to take 100% of the available MDQ provided by EnCana supply alternative. In this regard, please:

(a) discuss what demand sendout data were used in the SENDOUT model (did the Company use the forecast demand for the 2002-2005 period?);
(b) discuss what capacity and commodity resources (cost and volume) data were used in the SENDOUT model (did the Company use those for the 2002-2005 period?).

D.T.E. 1-11 Based on the resource optimization model, could the Company quantify the cost savings of Encana's supply alternative versus bid D's alternative.